

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CLERK
U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY

2024 MAR 18 P 3:39

Lynae Kisa Crawford

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Kipp Charter School
Associate of Reginal
District Tester

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

275 SUSSEX AVE
NEWARK N.J.

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

Reginal Specialish (Lucy Monterrosa)
275 SUSSEX AVE
ESSEX
NEWARK N.J. 07107
862-272-7022 / 973-481-0327

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name LUCY MONTERROSA
 Street Address 275 SUSSEX AVE NEWARK, NJ 07107
 County, City VI II
 State & Zip Code _____

Defendant No. 2

Name Mrs Capone
 Street Address _____
 County, City VI II
 State & Zip Code _____

Defendant No. 3

Name Regional District (Tester)
 Street Address _____
 County, City VI II
 State & Zip Code _____

Defendant No. 4

Name Deidra Sparks
 Street Address _____
 County, City VI II
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☐

Federal Questions

☐

Diversity of Citizenship

☒

U.S. Government Plaintiff

☐

U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? March 14, 2024 at Kipp Charter School

B. What date and approximate time did the events giving rise to your claim(s) occur? Between 10:30 am - 1:00 pm

C. Facts: My son Caleb Achae (9), was ask to take a test by a Regional District Special Needs Person, I was not notify this test was being taken. Caleb was sent to nurse of because of headache, I picked Caleb up. Caleb Achae is autistic he state.

The teacher was very rude and mean. "The She ask Am" Are you slow?" why are you a slow kid? Your handwriting is bad start over! Your so slow hurry up. I went on the whole time Caleb was being tested, Caleb told me he cried the whole time and she didnt care. Caleb mention this only because I always let him know his tears matters.

Caleb does not want to return to school. Caleb has been extremely sad. I was told by Mrs Monterosa that a very investigation has been made.

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Caleb has undergone Verbal, emotionally and mental abuse. I could not protect him while he was alone with the woman. I trusted Kipp to protect Caleb while he was in their care. Saturday on March 16th 2024 I attempted to file a Restraining order from this lady and incident report. The Sergeant Pena told me I couldn't.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

Yes, I'm requesting compensation for this barbaric emotional set back it has called. NO child especially with a disability should encounter this type of abuse. The school is also liable for this.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 18 day of march, 2024

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

E-mail Address

Lynae Crawford

478 South 26th Street
Newark NJ 07103
PO Box 5608 Hillside NJ 07035

908-465-4531

LynaeCrawford96@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff:

[Signature]

CLERK
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